

**ZACHARY W. CARTER**  
Corporation Counsel

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

**SABITA KRISHNAN**  
Phone: 212.356.2273  
Fax: 212.356.2038  
skrishna@law.nyc.gov

August 7, 2019

**Via Electronic Filing**

Hon. Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *The State of New York Ex. Rel. Vinod Khurana and the City of New York Ex Rel. Vinod Khurana v. Spherion Corp. (N/K/A SFN Group, Inc.)*, 15 cv 6605  
(JFK)

Dear Judge Furman:

I write on behalf of Interested Party the City of New York (the “City”) further to the City’s letter dated July 31, 2019 to respectfully request, for the reasons set forth below, that your Honor issue an order providing that the Records Management unit may allow undersigned attorney to view documents that are currently under seal in this matter.

All of the documents that are currently sealed are documents the City produced in response to a document request served on the City by Plaintiff-Relator Vinod Khurana. Many of those documents are from the files of the New York City Department of Investigation (the “NYCDOJ”) relating to the CityTime criminal investigation jointly conducted by the NYCDOJ and the office of the United States Attorney for the Southern District. The City is reviewing the documents that are currently sealed to determine if any should continue to remain sealed. However, there is at least one docket entry that indicates sealed documents that neither the City nor counsel for Plaintiff-Relator can definitively identify based on our records. The City submitted a number of documents to Magistrate Judge Frank Maas for in-camera review in connection with certain discovery disputes and it is possible that Judge Mass sealed these documents after the in-camera review. Accordingly, in order to be able to confirm the documents that are currently sealed, and which would be unsealed as provided for by your Honor’s July 19, 2019 Order, the City respectfully requests that your Honor issue an order

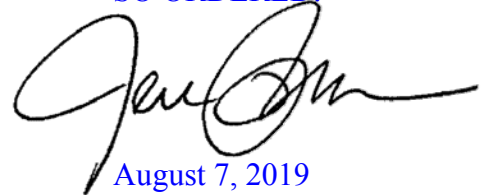
providing that the Records Management unit may allow undersigned attorney to view documents that are currently under seal in this matter.

Respectfully submitted,

/s/ Sabita Krishnan  
Sabita Krishnan  
Assistant Corporation Counsel

Application GRANTED. The Sealed Records department may allow counsel to view documents that are currently under seal in this matter. For the avoidance of doubt, the Court reminds all parties that in accordance with Paragraphs 7(C)-(D) of the Court's Individual Rules and Practices, any party moving for leave to maintain any documents under seal or in redacted form should provide the Court with electronic copies of any such documents in unredacted form (in the case of documents proposed to be sealed in full) or with proposed redactions highlighted (in the case of documents proposed to be filed publicly in redacted form). If such copies are too voluminous to attach to an email, the party should deliver them to the Court on a CD-ROM (*not* a flash drive). The Clerk of Court is directed to terminate ECF No. 159.

SO ORDERED.



August 7, 2019